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Courtesy copy, original filed by ECF, Docket No.: 11 CV 841 (SLT) (MDG)

October 13, 2011

BY HAND/ECF

Honorable Marilyn Go
Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: MDG J.R., et al. v. City of New York, et al
Civil Docket No.: 11 CV 841 (SLT) (MDG)
Our File No.: 06100-16602

Dear Magistrate Go:

This office represents the interests of Episcopal Social Services of New York, Inc., Marsha Ramsay, and Marcia Lewis-Conyers, Tamika McKenzie and Robert H. Gutheil. In a telephone conference conducted on July 26, 2011, the Court scheduled this matter for a further Conference on October 14, 2011.

The basis for the adjournment was for the plaintiffs' counsel to provide medical expert disclosure to the defendants for consideration for possible settlement of this matter.

Subsequent to that time, pursuant to the Order of Justice Gleason, oral argument was scheduled on multiple motions. These motions will be heard on October 14, 2011 as well.

We are requesting an adjournment of the telephone conference. Although we are conversant with your rules regarding such applications, we must respectfully submit that counsel for the plaintiffs only submitted the materials at 3:20 p.m. via e-

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mail yesterday afternoon. While we are not faulting him, the lateness of our receipt of these materials together, with the timing of the oral arguments on our other matters, makes it difficult to have a meaningful discussion with our principals on such short notice.

There have been no prior requests for an adjournment or extension made by this office. We have spoken to our adversaries and they have consented to an adjournment of the Conference. All counsel find that the optimum time for rescheduling this matter would be October 18, 2011 in the morning, if at all possible with this Court's schedule.

We must also advise the Court that Justice Townes has approved a briefing schedule which requires the defendants to adhere to the following briefing schedule: initial submissions are due by October 21, 2011; opposition is due by December 2, 2011 and replies are due December 14, 2011. The completely briefed motions are to be electronically filed at that time as well.

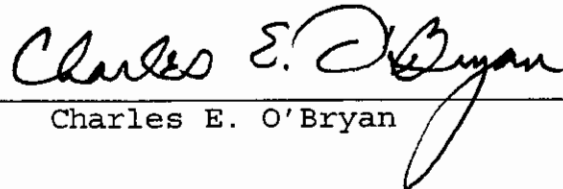
We would request that the Court adjourn this Settlement Conference until October 18th or at the Court's earliest convenience.

We thank the Court in advance for its consideration of these issues.

Respectfully submitted,

Jones Hirsch Connors & Bull P.C.

By:


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